

**1. Mr. Marceca Testified That He Believed That All of the Names on the List Were Current White House Passholders.**

Mr. Marceca was repeatedly asked whether, at the time he requested background reports from the FBI, he believed that all of the individuals listed on the Secret Service list were current passholders. Although Mr. Marceca acknowledged that he came to believe there were "problems" with the list, he repeatedly denied any knowledge that the Secret Service list contained inactive passholders.

**a. Mr. Marceca's June 9, 1996 Declaration.**

In the declaration he provided to Livingstone's attorney on June 9, 1996, Mr. Marceca gave the following explanation of how he ordered previous reports from the FBI:

It was my understanding that every person on the lists from which I was working was properly included on the lists because they had a legitimate need for access to the White House complex. I was not told, and I had no reason to believe, that some of the persons on the lists no longer should have been included on the Secret Service's White House access list. . . .<sup>115</sup>

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of senior White House officials); see also Marceca 6/9/96 Decl. at 4 (testifying that "[he] was not asked to, and [he] did not seek to, obtain a Previous Report on any person for any reason other than to create a current personnel security file for an individual whom [he] believed was properly included on the White House access list"); see also Marceca 9/11/99 OIC Depo. at 36 (denying that "anybody ever [told him] or suggest[ed] to [him] that the White House Personnel Security Office could be used to gather information about political opponents").

<sup>115</sup> Marceca 6/9/96 Decl. at 2.